

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	Criminal No. 03-_____
	:	
v.	:	Date Filed: December 17, 2003
	:	
RICHARD WORRELL,	:	Violations:
a/k/a "Bump"	:	
	:	21 U.S.C. § 841(a)(1) (Distribution of
	:	cocaine - 1 count)
	:	
	:	21 U.S.C. § 841(a)(1) (Possession with
	:	intent to distribute cocaine
	:	- 1 count)
	:	
	:	Notice of Prior Conviction

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about November 4, 2003, at Wayne, in the Eastern District of Pennsylvania,
defendant

RICHARD WORRELL,
a/k/a "Bump,"

did knowingly and intentionally distribute more than 500 grams, that is approximately 2,996
grams, of a mixture or substance containing a detectable amount of cocaine, a Schedule II
controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 4, 2003, at Wayne, in the Eastern District of Pennsylvania,
defendant

**RICHARD WORRELL,
a/k/a “Bump,”**

knowingly and intentionally possessed with the intent to distribute a mixture or substance
containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

NOTICE OF PRIOR CONVICTION

_____Defendant RICHARD WORRELL committed the offenses charged in Counts One and Two of this Indictment after having been convicted of the below-described felony drug offense:

1. On or about October 30, 1991, in the Court of Common Pleas, Delaware County, Pennsylvania, defendant RICHARD WORRELL was convicted of the felony offense of possession with intent to deliver a controlled substance (cocaine), arising out of an offense that took place on May 9, 1991.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney